

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS AND WILLIAM
ZHANG, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and
DANIEL LARIMER,

Defendants.

Civ. No. 1:20-cv-2809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY FUND
LLC and JOHNNY HONG, Individually and
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER,
DANIEL LARIMER, IAN GRIGG, and
BROCK PIERCE,

Defendants.

Civ. No.: 1:20-cv-3829

CLASS ACTION

**NOTICE OF MOTION OF
THE CRYPTO ASSETS OPPORTUNITY FUND, LLC FOR CONSOLIDATION OF
CASES, APPOINTMENT OF LEAD PLAINTIFF, AND APPROVAL OF COUNSEL**

PLEASE TAKE NOTICE that on a date and at a time designated by the Court, before the Honorable Lewis A. Kaplan, at the U.S. District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 21B, New York, New York, 10007, or by some other means chosen by the Court, The Crypto Assets Opportunity Fund, LLC (“CAOF”) will respectfully move this Court for the entry of an Order: (i) consolidating the two above-captioned putative class actions; (ii) appointing CAOF as Lead Plaintiff in the resulting consolidated class action pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”); and (iii) approving CAOF’s selection of Grant & Eisenhofer P.A. and the Bluhm Legal Clinic of the Northwestern Pritzker School of Law Complex Civil Litigation and Investor Protection Center as Lead Counsel. This Motion is made on the grounds that CAOF is the “most adequate plaintiff” pursuant to the PSLRA. In support of this Motion, CAOF submits the accompanying Memorandum of Law and Declaration of Daniel L. Berger and attached exhibits.

Dated: New York, New York
June 8, 2020

Respectfully submitted,

/s/ Daniel L. Berger

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Daniel L. Berger

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